

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: TESTOSTERONE REPLACEMENT  
THERAPY PRODUCTS LIABILITY LITIGATION

MDL No. 2545

Master Docket Case No. 1:14-cv-01748

Honorable Matthew F. Kennelly

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This document applies to: All Cases

**JOINT MOTION TO PRESENT SIMULTANEOUS SUBMISSIONS REGARDING  
ISSUES RELATED TO PRODUCTION OF CUSTODIAL FILES AND DEPOSITION  
COORDINATION PROTOCOL**

Plaintiffs and AbbVie Inc. jointly request to be heard on issues related to their simultaneous submissions regarding issues related to production of custodial files and the implementation of a deposition coordination protocol at the July 9, 2015 Case Management Conference. Counsel for Plaintiffs and AbbVie Inc. intend to file simultaneous submissions regarding these issues on Monday, June 29, 2015. With respect to these submissions, the parties propose that the Court set a briefing schedule for responses. Accordingly, Plaintiffs and AbbVie Inc. jointly propose the following briefing schedule:

<b>Date</b>	<b>Event</b>
June 29, 2015	Plaintiffs' and AbbVie Inc.'s Simultaneous Submissions Regarding Issues Related to Production of Custodial Files
July 6, 2015	Plaintiffs' and AbbVie Inc.'s Responses to Submissions Regarding Issues Related to Production of Custodial Files
July 9, 2015	Hearing on Submissions and Responses (to coincide with the next regularly scheduled status conference)

WHEREFORE, Plaintiffs and AbbVie Inc. respectfully request that this Court grant this motion and set the aforementioned briefing schedule.

Dated: June 25, 2015

Respectfully submitted,

/s/ Trent B. Miracle

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*Attorney for AbbVie Inc. and  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on June 25, 2015, the foregoing was filed with the Clerk of Court using the CM/ECF system which sent notification of such filing to all registered attorneys of record.

/s/ Trent B. Miracle

Trent B. Miracle